

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GRAHAM CHASE ROBINSON,

*Plaintiff,*

- against -

ROBERT DE NIRO and  
CANAL PRODUCTIONS, INC.,

*Defendants.*

Case No.: 1:19-cv-09156 (LJL) (KHP)

**DEFENDANTS’  
NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE**, that upon the annexed Declarations of Mr. De Niro, on behalf of himself and as President of Canal, Thomas A. Harvey, Laurent S. Drogin, Gregory R. Bennett, and Robin Chambers, all dated October 30, 2022, and the exhibits respectively annexed thereto, the accompanying memorandum of law, and upon all the papers and proceedings heretofore had herein, Defendants Robert De Niro and Canal Productions, Inc. hereby move, pursuant to Fed. R. Civ. P. [56](#) for an Order seeking dismissal of the retaliation claims brought under the Fair Labor Standards Act, 29 U.S.C. § [201](#), *et seq.*, and the New York Labor Law § [190](#), *et seq.* (“NYLL”); her gender and retaliation claims under the New York City Human Rights Law, New York City Admin. Code §[8-101](#), *et. seq.*; and the claim that plaintiff, Graham Chase Robinson (“Plaintiff”), was constructively discharged, as set forth in Plaintiff’s Complaint (ECF #[1](#)); along with such other further relief as the Court may find appropriate.

Dated: Hawthorne, New York  
October 30, 2022

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Dated: New York, New York  
October 30, 2022

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